



Rural Wisconsin Health Cooperative

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Thursday, October 19, 2000

Ms. Magalie Roman Salas
Secretary, Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RE: Ultra-Wideband (ET Docket 98-153)

Dear Ms. Salas:

I am writing on behalf of the Rural Wisconsin Health Cooperative, a network of 25 rural hospitals, regarding the FCC's Notice of Proposed Rulemaking concerning Ultra-wideband (UWB) radio transmission. Our institution is integrally involved in the development of telehealth and information related technologies and applications to establish new ways of increasing access to health care services in rural areas.

As we migrate various applications to an Internet / Intranet environment, we are aware of the tremendous potential for high-bandwidth wireless technologies which offer the growing Telehealth field the capability of transferring very large data files between users across short distances. Ultra-wideband offers low cost, high speed wireless connectivity for LANs in the critical first or last feet within our facilities. UWB would enable our institutions to avoid costly and disruptive interior wiring projects and allow our clinicians to use a variety of monitors, PDAs, laptops and other devices in a highly mobile environment.

Increasingly, we are looking for ways to communicate electronic patient medical records -- including high resolution images -- among wireless LAN users within and/or among our facilities and partners to facilitate medical specialty consults, second opinions, the transmission of critical data to and from emergency units, and to provide decision support at the point of care where it is especially vital.

UWB will greatly enhance our ability to develop "e-Health" applications, helping to improve both clinical performance and administrative efficiency -- both of which as you know are high priorities of state and federal health agencies. We believe that through improved charting and by bringing knowledge sources and medical databases via Internet connectivity through wireless LANs to the bedside, we should be able to reduce medical errors, a national issue highlighted in the Institute of Medicine's recent report entitled "To Err is Human: Building a Better Health System". In addition, secure, wireless connectivity to our LAN will also help us ensure safe, reliable, and accurate transmission of patient care records and other sensitive data required by the administrative simplification provisions of the federal Health

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Insurance and Portability and Accountability Act of 1996 (HIPAA).

In short, we are excited about the prospects for UWB, and would look forward to working to help develop and implement useful clinical and administrative applications for our health care institutions, the thousands of patients we serve, and the nation.

We hope that the Federal Communications Commission will favorably view the possibilities of UWB for healthcare in its rule making activities. Thank you for consideration of our comments.

Sincerely,

A handwritten signature in black ink that reads "Tim Size". The signature is written in a cursive, slightly slanted style.

Tim Size
Executive Director